

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
IN ADMIRALTY

MARKEL AMERICAN INSURANCE)
COMPANY,)
Plaintiff,)
)
v.)
RAYMOND FERRONE,)
Defendant.)
)
)
)

CASE NO. 04-CIV-12144 (GAO)

PLAINTIFF'S MOTION TO COMPEL DISCOVERY RESPONSES

COMES NOW the Plaintiff, MARKEL AMERICAN INSURANCE COMPANY, by and through its undersigned attorneys, and pursuant to Rule 37 of the Federal Rules of Civil Procedure, moves this Court for an Order compelling the plaintiff to respond to discovery requests served on or about January 31, 2005.

On January 31, 2005, the plaintiff served interrogatories and a request for production of documents to counsel for defendant Raymond Ferrone. To date, neither responses nor objections have been received by undersigned counsel.

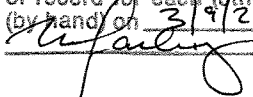
WHEREFORE, we respectfully request an order compelling the defendant 1) to provide the response to request for production of documents within twenty days; and 2) to answer the interrogatories within twenty days.


GOOD FAITH CERTIFICATION

Undersigned counsel certifies that he made a good faith effort to secure the requested information without court intervention by telephone on March 9, 2006.

Dated: March 9, 2006

MARKEL AMERICAN INSURANCE
COMPANY
By its Attorneys

I hereby certify that a true copy of the
above document was served upon (each
party appearing pro se and) the attorney
of record for each (other) party by mail
(by hand) on 3/9/2006



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